



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

RESPONSIVENESS SUMMARY TO COMMENTS RECEIVED DURING PUBLIC NOTICE For Proposed Air Quality Control Permit Number 1000194

Mojave Pipeline Operating Company, Topock Compressor Station
Begin Public Notice : November 4, 1997
End Public Notice : December 5, 1997

All of the following comments were submitted by Mojave Pipeline Operating Company.

TABLE 1 : Summary of Permit Requirements

Comment 1: *P1, P2, P3, P4, P5 and P6: Nox, CO, NMHC Monitoring/Recordkeeping - Replace "Copies of manufacturer's emissions related maintenance requirement on each IC engine" with Copies of emissions related maintenance requirement on each engine."*

Response: The change has been made.

Comment 2: *P1, P2, P3, P4, P5 and P6: Opacity - Remove requirement for montly opacity readings. Opacity discussion should include the exemption for first 10 minutes after cold atarting.*

Response: The requirement for monthly opacity readings is to assure compliance with the standard. Since the standard is more strigent than for the other compressor stations, a requirement for compliance measurement is required. No change is made to the condition. The exemption for the first 10 minutes after cold starting has been added to the table.

Comment 3: *P4 and P5- The requirement for an initial performance test within 30 days of installation should be removed and replaced with the timeframe required in R18-2-312. The regulation, R18-2-312, states that a performance test is required within 60 days after achieving the maximum production rate at which the unit will be operated, but no later than 180 days after initial start-up of the unit, permittee sahll conduct an initial performance test on the unit.*

Response: There is no requirement for initial testing specified in the permit.

Comment 4: *SOx Monitoring/Record keeping - Remove reference to "< 0.026 wt% (0.75gr/100 scf) and replace with 0.8 weight percent since the sulfur dioxide standard in R18-2-719.J*

references 0.8 weight percent.

Response: MPOC is required under FERC agreement to limit sulfur content in natural gas to less than 0.75 gr/scf which is equivalent to 0.026 weight percent. Our regulations require MPOC to limit the sulfur content to less than 0.8 weight percent. FERC stipulated 0.026% was specified as a reference. This has been removed to make the table consistent with the statements in permit conditions I.B.5.b of Attachment “B”. The table has been updated to reflect this change.

Comment 5: *P6-NOx, CO, NMHC, Reporting and Testing Frequency/Method - Remove annual testing requirement. Annual testing on the generator should not be required. The asterisk notes that only one engine is permitted to operate at any given time. It should be changed to ” * Only one engine is permitted to operate except at those periods when units are being switched.*

Response: Pursuant to the Arizona Testing Manual, all major emission points should be tested annually and any minor emission points should be tested annually, but on a rotational basis. Since a emission limit is applicable, testing will be required to show compliance with that limit. The language is revised to test the engines annually on a rotational basis.

Comment 6: *The table should include the exemption for the first 10 minutes after cold starting as noted in R18020719E.*

Response: The change has been made.

Comment 7: *F3. - Spray Painting. The language “architectural coating and spot painting projects shall be exempt from the recordkeeping requirement” should be after “MSDS of paints used” so that it will be consistent with Attachment B.II.C.2.a.*

Response: The language in parenthesis has been moved to follow “MSDS of paints used” in the summary table to be consistent with the permit condition II.C.2.a. of Attachment B.

Comment 8: *F4. a. and b. Mobile Sources Monitoring/Record keeping - The language should be revised as follows:*

Record of all emissions related maintenance activities performed on Permittee’s roadway and site cleaning machinery stationed at the facility.

Response: The table has been modified to include the language “stationed at the facility” in F4.b. In addition, F4.a. has been changed to read as follows:

Record of all emissions related maintenance activities performed on Permittee's off-road machinery **stationed at the facility.**

ATTACHMENT A

Comment 9: *II. Compliance with permit conditions:*

A. The first sentence of this provision should be reworded to conform to the permit shield provisions of R18-2-325:

The Permittee shall comply with all conditions of this permit, which sets forth all applicable requirements of Arizona's air quality statutes and the air quality rules.

The existing language could be read as requiring the Permittee to comply with "all applicable requirements" which contradicts the purpose of a Class I permit.

Response: Pursuant to comments from EPA, the permit shield language was very general, and could be interpreted to broadly apply to every requirement mentioned in the permit. Furthermore, the permit shield language as written could be assumed to apply to applicable requirements that are not included or addressed in the permit. Hence, the new permit condition is reworded as "Compliance with the conditions of this permit shall be deemed compliance with all applicable requirements as listed in Attachment"C", as of the date of permit issuance." A permit shield may not be provided for a given rule or portion of a rule unless the shielded requirement is fully captured by a permit condition (or is explicitly deemed not applicable).

Section II.A which now reads:

"The Permittee shall comply with all conditions of this permit, **which sets forth all applicable requirements** of Arizona air quality statutes and air quality rules...."

has been modified to read as:

"The Permittee shall comply with all conditions of this permit **including all applicable requirements** of Arizona air quality statutes and the air quality rules...."

Comment 10: *XI. Permit Deviation Reporting*

MPOC has a number of concerns with this condition. First, R18-2-310 provides for an affirmative defense if the notification requirements set forth in R18-2-310.c and repeated in Attachment "A", Condition XI are met, but ADEQ has construed the provision in the permit as "mandating" excess emission reports whether the affirmative defense is claimed or not. This interpretation is inconsistent with how R18-2-310 has been interpreted in the past. ADEQ should clarify that the excess emissions reports in Subsection A are NOT required unless the affirmative defense is claimed.

Until EPA approves R18-2-310 into the Arizona SIP and/or the Title V program, all of the proposed conditions (Subsections A, B, C, and new Section D) should be designated in the permit as "NOT FEDERALLY ENFORCEABLE".

R18-2-310 (A) provides for an affirmative defense if the notification requirements set forth in R18-2-310.c and repeated in Attachment “A”, Condition XI are met. MPOC understands that EPA is currently taking the position that R18-2-310 is not approvable as part of ADEQ Title V program. Nevertheless, R18-2-310 is part of Arizona law and MPOC believes that it should be incorporated into the permit. Accordingly, MPOC proposes the following new Subsection D:

- D. Upon approval of R18-2-310 into the Arizona SIP or ADEQ Title V program, unless the provision of Attachment “A”, XI.A.5. apply, it shall be an affirmative defense if the permittee has complied with the reporting requirements set forth in Subsection A of this condition in a timely manner and has demonstrated all of the following:
1. The excess emissions resulted from a sudden and unavoidable breakdown of the process or the control equipment, resulted from unavoidable conditions during the startup or shutdown, resulted from unavoidable conditions during an upset of operations, or that greater or more extended emissions would result unless scheduled maintenance is performed;
 2. The air pollution control equipment, process equipment, or processes were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
 3. Where repairs were required, such repairs were made in an expeditious fashion when the applicable emissions were being exceeded and off-shift labor and overtime were utilized where practical to insure that such repairs were made as expeditiously as possible. If off-shift labor and overtime were not utilized, the Permittee must satisfactorily demonstrate that such measures were impractical;
 4. The amount and duration of excess emissions (including any bypass operation) were minimized to the maximum extent practicable during periods of such emissions;
 5. All feasible steps were taken to minimize the impact of the excess emissions on potential violations of the ambient air quality standards;
 6. The excess emissions were not part of a recurring pattern indicative of inadequate design, operation, or maintenance; and;
 7. During the periods of excess emissions there were no measured violations of the ambient air quality standards which could be attributed to the facility.

Response: For some reason there has been some misunderstanding regarding the AAC R18-2-310 reporting requirements. We have been trying to clarify the reporting requirements under R18-2-310 not only with MPOC but other Permittees as well. The excess emissions reports

are required under AAC R18-2-310 regardless of whether the Permittee wants to claim affirmative defense or not. If there is a case of excess emission, then the Permittee needs to report it. There is no ambiguity involved either in the interpretation above or in the intent of the rule. The Permittee may also claim affirmative defense under AAC R18-2-310.A if the reporting requirements of AAC R18-2-310.C and all of the conditions of AAC R18-2-310.A were met.

As part of its interim approval of ADEQ's Title V program (October 30, 1996, Federal Register, Page no. 55910) EPA has granted ADEQ the authority to implement its Title V program according to the regulations that have received interim approval including the AAC R18-2-310 excess emissions affirmative defense provision. Thus, Subsections A, B, and C of condition XI of Attachment A are approved under federal Part 70 program and are federally enforceable.

Pending further resolution and final action on AAC R18-2-310 by the EPA, condition XI will continue to be in effect *status quo*. Upon final action, the permit will be reopened to reflect the appropriate changes as required.

This comment does not result in a change in the permit condition.

Comment 11: *XVII. Testing Requirements*

MPOC understands that normal rated capacity means capacity reflecting ambient temperature, pressure and humidity conditions present during the emissions test. MPOC also understands that ADEQ's inclusion of the provision allowing for performance testing at lower operational rates with the Director's prior written approval acknowledges that at certain times there may be insufficient natural gas throughput to operate at "normal rated capacity" in which case testing may be deferred or conducted at a lower operating rate. While MPOC would prefer that ADEQ include permit language defining normal rated capacity as capacity reflecting ambient conditions and available pipeline capacity, MPOC is willing to accept ADEQ's explanation of its intent in the Technical Review Document and response to these comments.

Response: ADEQ is aware that MPOC may or may not operate the turbine(s) at their normal rated capacity, during the life of the permit. Given the unpredictability in operations, it was decided that the optimal course of action would be to obtain written approval from the Director at the time of testing, if the testing is to be performed at a lower rate. This comment does not result in a change in the permit language.

ATTACHMENT B

Comment 12: *I. Emission Limitations (I.C.1.b.3)*

MPOC understands that this section does not preclude incidental operation of the off-

line Caterpillar unit for routine maintenance of that unit.

Response: ADEQ wishes to clarify that operation of the off-line unit for maintenance purposes only does not violate condition I.A.

Comment 13: *Opacity limit should match R18-2-719.E. regulation which requires opacity to not exceed 40%. Although EPA suggested a 10% opacity, there is no underlying applicable regulatory requirement to mandate meeting the lower opacity limit.*

Response: The 10% opacity limit was specified by EPA as a means to provide ample margin in protecting the NAAQS. Further limiting to 10% assures good operation of the equipment for maintaining BACT. Hence this limit cannot be changed.

Comment 14: *MPOC does not believe that the sulfur dioxide limits contained in the proposed permit are “applicable requirements” required to be included in a Class I permit. While the NOx and CO limits in the permit are applicable requirements because they exceeded the “significance” levels and hence were subject to PSD review under R18-2-406(A)(1), sulfur dioxide emissions do not exceed significance levels and PSD review did not extend to them. Accordingly, the sulfur dioxide limits are not applicable requirements” and should not be contained in the Class I permit.*

While the installation Permit No. 1231 states that it establishes a sulfur dioxide limits and NMHC limit for the Cooper Bessemer and Caterpillar units, as ADEQ noted in the Technical Review Document, sulfur dioxide and NMHC do not exceed the “significance “ amounts. The amounts are so insignificant so as not to pose any real issues regarding attainment of all NAAQS. Therefore, MPOC believes that these “limits” are not applicable requirements at all, but simply represent emissions information submitted about the facility. Pursuant to the EPA White Paper, which urges the use of the Title V permitting process to eliminate obsolete or incorrect preconstruction review requirements, MPOC requests that the SO2 and NMHC limits be eliminated. The sole restriction on SO2 be that established at R18-2-719.J. The results of the initial performance tests conducted in 1992 show that at maximum operating capacity NMHC emissions are less than one-third the maximum allowable (1.88 lb/hr vs. 6.09 lb/hr allowable) and SO2 emissions are a little more than 3% of the maximum allowable (0.0016 lb/hr vs. 0.07 lb/hr allowable.) The original permit does not require NMHC and SO2 testing. Since the Title V permit process should not impose any new requirements on the permittee, the NMHC and SO2 emissions testing requirements should be removed.

Response: Pollutants emitted in significant quantities were reviewed for PSD. However, those pollutants that were emitted in less than significant quantities were only reviewed for ambient impacts. The limits were specified in the permit so that the emissions would not be increased to greater than significant levels which otherwise would have been subject to PSD review process. Further modeling showed that there were no ambient impacts for those pollutants. Hence the limits are specified in the permit. These are not obsolete or incorrect

requirements. Even though the actual emissions are well below the allowable, testing only determines compliance with the limit and not a reason to remove them from the permit.

Comment 15: *MPOC understands that dust suppressants or wetting agents are to be used during construction operations, repair operations, and demolition activities directly associated with earth moving or excavation activities likely to generate excessive amounts of particulate matter and not for any construction operation, repair operation, or demolition activity. MPOC requests ADEQ clarification if this is not ADEQ's intent.*

Response: The intent of condition I.D.1.b.(3) of Attachment "B" of the permit is to regulate excessive emissions of particulate matter. The intent of this condition is further clarified by the wording of condition I.D.1.b which is as follows: "Permittee shall employ the following methods to prevent excessive amounts of particulate matter from becoming airborne:". Those construction, repair, or demolition operations that have no associated particulate matter emissions are not subject to the requirements of condition I.D.1.b.(3) of Attachment "B" of the permit. This comment does not result in a change in the permit language.

Comment 16: *I. Emission Limitations (I.E.1)*

The proposed permit language limits "good modern practices" to wet blasting and effective enclosures whereas the rule simply gives wet blasting and effective enclosures as examples of good modern practices. MPOC requests that "Good modern practices include:" be changed to "Examples of good modern practices include:".

Response: Although the rule gives wet blasting and effective enclosures as examples of good modern practices, ADEQ believes that limiting good modern practices to the two mentioned practices would enhance the enforceability of the permit. There is no change in the permit condition.

Comment 17: *I. Emission Limitation (I.E.5)*

Emissions Limitations

On occasion, MPOC personnel will need service air conditioners at remote compressor stations. Therefore, we need to add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only "applicable" requirements must be met by MPOC.

5. Nonvehicle Air Conditioner Maintenance and/or Services

When Permittee's employees are servicing applicable appliances, the permittee shall comply with applicable requirements of 40 CFR 82- Subpart F.

Response: Th Permittee had originally included air conditioning servicing, expected to be performed by

outside contractors, in the permit application. During the public comment period, MPOC decided that they might perform such activities themselves and requested for the inclusion of applicable requirements of 40 CFR 82 - Subpart F in the permit. A condition to this effect has been added in I.D.5 in Attachment "B" of the permit.

Comment 18: *Monitoring and Record keeping (II.A.1)*

MPOC understands that we need to maintain an updated copy of the extracted portion of the FERC approved tariff which pertains to the sulfur content and lower heating value of the fuel and not the entire FERC tariff which is a voluminous and periodically edited document. MPOC requests ADEQ clarification if this is not ADEQ's intent.

Response: The intent of condition II.A.1 of Attachment "B" of the permit is to monitor particulate and sulfur dioxide emission standards only. The language has been modified to further clarify that tariff information relating only to lower heating value and fuel sulfur content needs to be kept on file. The modified language is reproduced below:

Permittee shall monitor daily, the sulfur content and lower heating value of the fuel being combusted in the gas turbine. This requirement may be complied with by maintaining a copy of that part of the Federal Energy Regulatory Commission (FERC) approved Tariff agreement that limits transmission to pipeline quality natural gas of sulfur content less than 0.8 percent by weight and having a heating value greater than or equal to 967 Btu/ft³.

Comment 19: *Monitoring and Record keeping (II.B.2)*

Sulfur dioxide and Non-Methane Hydrocarbons - MPOC does not believe that sulfur dioxide and non-methane hydrocarbons require monitoring as there is no underlying "applicable" requirement. Accordingly, MPOC requests that this provision be deleted.

Response: See comment #14

Comment 20: *Nitrogen Oxides and Carbon Monoxide - The language "Maintain copies of manufacturers emissions related maintenance records performed on the reciprocating engines." should be changed to "Maintain copies of emissions related maintenance records performed on the reciprocating engines." MPOC has a condition based maintenance system which includes preventive maintenance, predictive analysis, quality repairs, quality parts, and a computer based maintenance management system (MVIS) which monitors a variety of parameters and recommends maintenance tasks based on need rather than solely on the manufacturer recommendation. The historical emissions test results show that emissions are well below the permit limits. The use of a condition based maintenance management system assures that the engines will meet the permit limits.*

Response: The change has been made.

Comment 21: *The current language is not clear that the testing requirement is on a rotational basis. Revise language to read " Permittee shall conduct annual performance tests on one reciprocating Cooper Bessemer engine each year. The other Cooper Bessemer engines shall be tested on a rotational basis.*

In regards to the auxiliary Caterpillar units, testing of these units was not required as per the operating permit. Based on the 1992 emissions test, the potential to emit based on 8760 hours of operation is approximately 10 tpy of NOx and 25 tons CO. The NOx emissions are approximately 1/4 of the "significant " level . The emissions from the auxiliaries are not major and annual testing should not be required. The current operating permit does not require emissions testing of the auxiliary units. Pursuant to the EPA White Paper, which urges the use of the Title V permitting process to not impose new requirements, the requirement for annual emission tests of one auxiliary units should be removed.

Response: The change has been made for the Cooper Bessemer units.
In regards to the auxiliary Caterpillar units, the Arizona Testing Manual requires rotational testing of all minor points. In addition, testing has been specified to determine compliance with the applicable limits. Hence the engines will be required to be tested.

Comment 22: *The ADEQ Technical Review and Evaluation of Application for Air Quality Control Permit mentions that "Natural gas is recognized as a clean burning fuel. Experience has indicated that particulate emissions and opacity readings do not exceed the permit limits.". An ADEQ inspector, Mr. Mike Howeth, field activity reports in 1995 and 1996 confirm that opacity readings do not exceed the permit limits. In addition, the opacity was probably observed by ADEQ inspectors during the emissions test in 1992, 1993, 1994, 1995, 1996, and 1997. Therefore, monthly opacity readings for six months and semiannually thereafter do not serve any purpose but only impose unnecessary expenses to MPOC. The requirement for opacity readings should be stricken.*

Response: ADEQ fully agrees with MPOC that burning natural gas will not exceed the standards. However, past data does not indicate future compliance. Further, the 10% opacity limit was specified to provide ample margin to protect the NAAQS. The only means of assuring compliance will be to conduct regular measurements. ADEQ believes that monthly readings for 6 months is a reasonable time to demonstrate compliance and thereafter perform twice a year.

Comment 23: *The requirement to record hourly fuel usage is overly burdensome because it does not consider periods during which the monitoring device, fuel meter, is inoperative due to routine maintenance, calibration, and downtime for engine adjustment. Just as ADEQ has indicated in Attachment A, Section XVI C, periods of routine maintenance activities should be exempt from the monitoring requirement. In addition, malfunction events where there is a sudden and unavoidable breakdown*

of the measurement equipment that resulted from unavoidable conditions during startup or shutdown or resulted from unavoidable conditions during an upset of operations should be exempt from the monitoring requirement.

MDOC utilizes two Caterpillar units for primary power generation. There is only one orifice meter for the two Caterpillar units. MPOC will be evaluating the feasibility of installing individual fuel measurement devices. Although only one unit is operated continuously, during periods when the units are being switched, there are times when both units will be operating. Manually recording the time period when both Caterpillar units are operating is overly burdensome since on occasion, the units are switched back and forth for a few minutes. An electronic method to record the time period when both Caterpillar units are operating will take time to develop. The hourly fuel usage monitoring and limit should exempt the brief periods when the units are being switched.

The requirement to keep records in an electronic format as long as such records are in a format that cannot be altered or modified after recording is burdensome. MPOC notes that there is no provision in the Arizona air regulations that specifically authorizes ADEQ to impose such a requirement that electronic records in the format maintained by MPOC are acceptable to a wide range of other regulatory agencies equally charged with protecting public safety. MPOC does not currently have a system at the remote facility to keep electronic records in a format that cannot be altered or modified after recording. Currently, MPOC utilizes an orifice meter for each Cooper Bessemer unit and one meter for both Caterpillars. The data from the individual Cooper Bessemer meter enters a centralized station computer where it is electronically downloaded into an Excel Spreadsheet. If the Excel Spreadsheet format is acceptable to ADEQ, the Excel Spreadsheet could be write protected with only one or two individuals given access to the file. The development of a sophisticated electronic recordkeeping system that cannot be altered or modified after recording will take substantial time to develop and integrate into station systems although MPOC currently records fuel usage. MPOC has an economic incentive to decrease fuel usage since fuel costs directly affect our bottomline and reduce throughput to natural gas distribution companies.

Therefore, this section should be revised to read as follows:

Permittee shall record on an hourly basis the amount of fuel combusted in each Cooper Bessemer and the Caterpillar engines, except during periods of routine maintenance, calibration, and periods of switching between the Caterpillar engines. Permittee shall keep routine maintenance and calibration records of the individual Cooper Bessemer and Caterpillar fuel measurement device. Excess emissions, emergencies, and malfunctions of the individual Cooper Bessemer and Caterpillar fuel measurement device shall be reported in accordance with the provisions of Attachment 'A', XI of this permit.

In the event that ADEQ continues to insist upon an unalterable electronic record, MPOC will require time to develop such a system. MPOC proposes the following provision:

Permittee shall provide a timetable to the Department within 90 days after permit issuance for the development and installation of an electronic recordkeeping system that cannot be altered or modified after recording.

Response: The requirement to monitor the fuel was to ensure compliance with the emission limits at any time. Since there are no other periodic monitoring requirements that can be imposed, the limits on the fuel have been retained.

ADEQ understands manually recording the time period when both Caterpillar units is operating is burdensome, however, until the time when MPOC has developed the electronic logging, there will be a requirement for monitoring the fuel. As stated in the previous paragraph, the fuel requirement has been placed to assure compliance with the emission limits. Also, ADEQ will require an unalterable electronic record. The language is revised to read as follows:

5. Fuel Amount

Permittee shall record on an hourly basis, the amount of fuel combusted in each Cooper Bessemer and Caterpillar engine **except during periods of routine maintenance, calibration, and periods of switching between the Caterpillar engines when the time period and the horsepower loading will be manually logged.** This record may be kept in an electronic format as long as such records are in a format that cannot be altered or modified after recording. **Permittee shall provide a timetable to the Director within 90 days after permit issuance for the development and installation of an electronic recordkeeping system that cannot be altered or modified after recording.**

Comment 24: Monitoring and Record keeping (II.C.1)

For a more streamlined permit, MPOC suggests that ADEQ consider combining the identical provisions of II.B.1.c through II.B.1.i. MPOC proposes

c. Dates on which any of the activities listed in I.D.1.b.(3) through (9) were performed, and control measured adopted.

Response: The current format of condition II.B.1 of Attachment “B” of the permit will be retained since it enhances the readability of the permit.

Comment 25: Monitoring and Record keeping (II.D.1)

A record of the abrasive blasting project requires a log in ink. MPOC requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic Record keeping. Since MPOC must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.

Response: The language of condition II.C.1 of Attachment “B” of the permit has been modified as follows:

“Each time an abrasive blasting project is conducted, the Permittee shall log in ink **or in an electronic format**, a record of the following:....”

Comment 26: Monitoring and Record keeping (II.D.2)

A record of the spray painting project requires a log in ink. MPOC requests that “in ink” be removed since it implies that a handwritten rather than a printed electronic log must be kept. Many other agencies such as DOT and Arizona Corporation Commission accept electronic Record keeping. Since MPOC must comply with the every 6 month compliance certification, it is our duty to assure that the records are accurate and complete.

Response: The language of condition II.C.2.a of Attachment “B” of the permit has been modified as follows:

“Each time an spray painting project is conducted, the Permittee shall log in ink **or in an electronic format**, a record of the following:....”

Comment 27: Monitoring and Record keeping (II.D.3)

MPOC continues to assert that there is no strict correlation between maintenance activities and exceeding the 40 % opacity standard for mobile sources. MPOC objects to the current provision to the extent that it seeks to require Record keeping of mobile sources that are not permanently or semi-permanently maintained at this station. MPOC understands that equipment brought in from other areas of the system must comply with the mobile source requirements of R18-2-802 and R18-2-804(a), but mobile equipment stationed elsewhere should not be subject to site-specific permit requirements. MPOC has mobile sources located in El Paso, Gallup, and other locations within the MPOC system. The current permit language requires a record of maintenance activities of Permittee’s equipment. “Permittee’s equipment” could mean equipment stationed in El Paso or other MPOC locations that would never be used at the permitted facility. Therefore, MPOC requests that the permit language be revised

On occasion, MPOC personnel will need service air conditioners at remote compressor stations. Therefore, we need to Add #5. When contracting air conditioner maintenance service, the contractor will ensure that requirements of 40 CFR 82-Subpart F are met. Since some parts of Subpart F are applicable only to manufacturers or importers of recycling equipment or other particular situations, the language below notes that only “applicable” requirements must be met by MPOC.

5.Nonvehicle Air Conditioner Maintenance and/or Services

As a means of demonstrating compliance with condition I.C.5 of this Attachment, the Permittee shall keep a record of all relevant paperwork of 40 CFR Part 82-Subpart F applicable requirements on file.

Response: Please see Comment No. 11. A condition to this effect has been added in II.C.5 of Attachment “B” of this permit.

Comment 29: *Monitoring and Record keeping(II.E)*

MPOC understands that a log of all records does not preclude the use of a three ring binder or centralized file folders. MPOC requests ADEQ clarification if this is not ADEQ’s intent. It is our understanding that ADEQ is contemplating a requirement to keep an index of records in a bound logbook. Record keeping in a bound logbook or preparing an index in a bound logbook for every job ticket, FERC tariff, and other record is unnecessary double work. Since MPOC must comply with every 6 month compliance certification, it is our duty to assure that the records are accurate and complete. The ADEQ does not specify how records must be kept. Please consider deleting the requirement for a cross index in a bound log book and bound logbook itself.

Response: ADEQ wishes to clarify that a log of all records does not preclude the use of three ring binders or centralized file folders. The requirement for a cross index has not been included in the draft permit condition language. Therefore, this comment does not apply to Seligman compressor station. There is no change in the permit condition.

Comment 30: *Reporting Requirements (IV.C.)*

Remove requirements to submit reports of opacity readings.

Response: The requirement will be required since the need for opacity measurements is retained.

Comment 31: *Testing Requirements (V.A.1)*

Replace “Permittee shall conduct...” with “Permittee, on a rotational basis, shall conduct..” so that it is clearer. Remove testing requirement for Caterpillar unit.

Response: The first sentence will be modified to reflect the language. The testing requirement will be retained since the Arizona Testing Manual requires testing of minor sources.

Comment 32: *Testing Requirements (V.A.2.)*

Remove this Section since MPOC believes there is no applicale requirement to test for NMHC under R1-2-719 or any other regulation.

Response: See comment #14

Comment 33: *Testing Requirements (IV.B)*

Remove reference to Article 9 or 11 since the units are not known to be NSPS and HAP sources.

Response: The references has been removed.

ATTACHMENT C

Comment 34: *Attachment "C"*

MPOC objects to including portions of the Installation Permit No. 1231, Attachment C as an applicable requirement for the following reasons: (1) It includes sulfur dioxide and non-methane hydrocarbons and for the reasons discussed earlier in the comments, the

*note " * For Cooper Bessemer units, summer time siterated horsepower is 4080 bhp with an evaporatively cooled inlet air temperature of 75° F, and the winter site-rated horsepower is 4,640 hp at an evaporatively cooled inlet air temperature of 40° F. The Caterpillar unit rated horsepower is 1500 at 1118.5 KW and 900 RPM. "*

The double asterisk footnote should read " Only one generator is permitted to be operated at and given time except those times of unit switching. "

Response: The permit has been updated as specified.

ATTACHMENT E

Comment 27: The draft Wenden permit has Item 33 - Routine Startups and shutdowns. Please add this item to the list of insignificant activities.

Response: The item has been added.